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10 Attorneys for Defendant CHUCK HAGEL

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 MARY JENNINGS HEGAR, JENNIFER HUNT,  
16 ALEXANDRA ZOE BEDELL, COLLEEN  
17 FARRELL, and SERVICE WOMEN'S ACTION  
NETWORK,

18 Plaintiffs,

19 v.

20 CHUCK HAGEL, Secretary of Defense,

21 Defendant.  
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23  
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CASE NO. C 12-06005 EMC

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE INITIAL  
CASE MANAGEMENT  
CONFERENCE SET FOR JULY 18,  
2013 AND ADR DEADLINES**

1 Defendant Chuck Hagel,<sup>1</sup> Secretary of Defense (“Secretary”) and Plaintiffs Mary  
 2 Jennings Hegar, Jennifer Hunt, Alexandra Zoe Bedell, Colleen Farrell, and Service  
 3 Women’s Action Network (collectively, “the parties”), by and through their respective  
 4 counsel, hereby stipulate as follows:

5 1. On November 27, 2012, Plaintiffs filed their Complaint for Declaratory and  
 6 Injunctive Relief challenging as unconstitutional the 1994 direct ground combat definition  
 7 and assignment rule, and the Court issued an Order Setting Initial Case Management  
 8 Conference and ADR Deadlines;

9 2. On January 24, 2013, the Secretary rescinded the 1994 direct ground combat  
 10 definition and assignment rule and directed the Military Services to submit plans to him by  
 11 May 15, 2013, for implementation of this policy change;

12 3. In light of the above, on January 29, 2013, the parties filed a stipulation with  
 13 the Court agreeing to meet and confer within three weeks of the deadline for submitting the  
 14 implementation plans and to allow the Secretary thirty (30) days after that meet and confer  
 15 to respond to the Complaint;

16 4. On February 7, 2013, the parties filed a stipulation and proposed order with  
 17 the Court to continue the initial case management conference and ADR deadlines, and on  
 18 February 8, 2013, the Court ordered revision of the initial case management conference and  
 19 ADR deadlines set forth in the November 27, 2012 Order as follows:

20 6/15/2013 Last day to: meet and confer re: initial disclosures, early settlement,  
 21 ADR process selection, and discovery plan; file ADR Certification  
 22 signed by Parties and Counsel; file either Stipulation to ADR Process  
 23 or Notice of Need for ADR Phone Conference  
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27 <sup>1</sup> Pursuant to Rule 25(d)(1) of the Federal Rules of Civil Procedure, Chuck Hagel,  
 28 Secretary of Defense, is automatically substituted for Leon Panetta, former Secretary of  
 Defense, who is named in the Complaint.



from July 18, 2013, to October 3, 2013, which is 14 days after the Secretary's response to the Complaint is due; and that the deadline for the parties' Rule 26(f) Report, initial disclosures or statement of objection in Rule 26(f) Report, and Case Management Statement be continued to September 12, 2013.

ACCORDINGLY, the parties respectfully request that the Court revise the initial case management conference and ADR deadlines set forth in the February 8, 2013 Order as follows:

8/30/2013 Last day to: meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan; file ADR Certification signed by Parties and Counsel; file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference

9/26/2013 Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report, and file Case Management Statement per the Court's Standing Order re Contents of Joint Case Management Statement

10/3/2013 Initial Case Management Conference

IT IS SO STIPULATED.

DATED: June 7, 2013

MUNGER, TOLLES & OLSON LLP  
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ROSEMARIE T. RING, ESQ.

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/s/ Steven M. Perry  
STEVEN M. PERRY  
Attorneys for Plaintiffs  
(Electronic signature authorized  
verbally to counsel)

/s/ Caroline Lewis Wolverton  
CAROLINE LEWIS WOLVERTON  
U.S. Department of Justice  
Attorneys for Defendant

PURSUANT TO THE PARTIES' STIPULATION, IT IS HEREBY ORDERED  
THAT:

The initial case management conference and ADR deadlines are revised as follows:

8/30/2013 Last day to: meet and confer re: initial disclosures, early settlement,  
ADR process selection, and discovery plan; file ADR Certification  
signed by Parties and Counsel; file either Stipulation to ADR Process  
or Notice of Need for ADR Phone Conference

9/26/2013 Last day to file Rule 26(f) Report, complete initial disclosures or state  
objection in Rule 26(f) Report, and file Case Management Statement  
per the Court's Standing Order re Contents of Joint Case  
Management Statement

10/3/2013 Initial Case Management Conference

DATED: 6/11, 2013

Edward M. Chen  
United States District Judge

